

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re: **ERICA T. BRADLEY-MCCABE**, aka : Chapter 13
Erica McCabe, aka Erica King, aka : Case No. **5:18-bk-00282**
Erica T. King, aka Erica T. McCabe, aka :
Erica Tiffany Bradley-McCabe, aka :
Erica Bradley-McCabe, :
Debtor. :

TOYOTA MOTOR CREDIT CORPORATION, :
Movant, : Motion for
v. : Relief from Stay
ERICA T. BRADLEY-MCCABE, :
CHRISTOPHER L. MCCABE, and :
CHARLES J. DEHART, ESQUIRE, TRUSTEE, :
Respondents :

ANSWER TO MOTION OF TOYOTA FOR RELIEF FROM STAY

AND NOW COMES Debtor(s) **ERICA T. BRADLEY-MCCABE**, by and through their attorneys, NEWMAN, WILLIAMS, MISHKIN, CORVELEYN, WOLFE & FARERI, P.C., with Answer to Motion of **TOYOTA** for Relief from Stay, and in support thereof aver(s):

1. Admitted.
2. Admitted.
3. Denied to the extent the referenced document(s) do not speak for themselves.
4. Denied to the extent the referenced document(s) do not speak for themselves.
5. Admitted.

6. Denied. Debtor provided for the postpetition payment due February 14, 2018, via her Confirmed First Amended Chapter 13 Plan (“the Plan.”) Debtor made regular payments on April 29, May 4, June 15 and July 13, 2018. An October 1, 2018 payment history was provided by Movant on or about October 4, 2018, after which Debtor made two payments of \$ 628.01 on or about October 19, 2018, then two payments of \$ 628.01 on or about November 14, 2018. As of the date of the Motion for Relief, only the November 14, 2018 payment was due, which was not “late.” See section 3 on page 3 of Exhibit A to the Motion.

7. Denied. See response to paragraph 6.

8. Denied. Movant is adequately protected by ongoing direct payments, arrears cured via the Plan, current status of preventive maintenance and Geico auto insurance policy ending in 7005.

9. Denied to the extent the averments of paragraph 9 are other than a statement or conclusion of law that does not require a response. Movant fails to allege a basis for such extraordinary relief.

WHEREFORE, Debtor(s) **ERICA T. BRADLEY-MCCABE** respectfully pray this Honorable Court for an Order that the Motion of **TOYOTA** for Relief from Stay be Denied, and for such other and further relief as the Honorable Court deems just and appropriate.

NEWMAN, WILLIAMS, MISHKIN,
CORVELEYN, WOLFE & FARERI, P.C.

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